



CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

Corporate responsibility means integrity in everything we do. Our values focus and align us as a company. They form the foundation of our behavior, how we conduct business, make decisions, and treat others. We insist on ethical behavior, environmental stewardship, and a focus on safety. We expect our suppliers to follow all laws that require them to treat workers fairly, provide a safe and healthy work environment, and protect natural resources. Being a good corporate citizen reinforces the attractiveness of our brands and products, and it's the right thing to do.

The ATK Business Ethics Code of Conduct outlines and reinforces our commitment to ethical behavior at every level. Every ATK employee is required to read, understand, and comply with the Business Ethics Code of Conduct, which clearly explains the company's standards. On an annual basis, ATK conducts mandatory Business Ethics Code of Conduct training for all employees. We maintain an Ethics Helpline, which enables employees or any third party to raise ethics concerns and questions. All concerns are investigated and when violations occur, corrective measures are promptly instituted and carried out. ATK strictly prohibits retaliation for raising a concern or question about ethics and compliance.

As required by the Federal Acquisition Regulations, ATK's standard terms and conditions for solicitations and contracts include the appropriate clause declaring zero tolerance for trafficking in persons and the use of forced labor. Suppliers are required to comply with this prohibition and take affirmative steps to combat trafficking in persons and forced labor. ATK's suppliers are required to flow compliance with this clause down to their suppliers.

We conduct due diligence to assess potential supplier compliance to ATK standards and applicable laws. Once a supplier is engaged under contract, we utilize a set of audit tools to ensure a supplier's continued compliance during its performance. We regularly assess risk related to our supply chain based on geography, commodity purchased, quality, and efficient performance. Suppliers failing to meet ATK's standards are terminated.